

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

12 M 708

- - - - -X

UNITED STATES OF AMERICA

PRE-ARRAIGNMENT  
C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

FIDEL ARREDONDO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRIS MCKELVY, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about July 30, 2012, with in the Eastern District of New York and elsewhere, defendant FIDEL ARREDONDO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof heroin, a Schedule I controlled substance, and cocaine, a Schedule II controlled substances.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

---

<sup>1/</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On July 30, 2012, defendant FIDEL ARREDONDO arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines flight number 1752 from Santo Domingo, Dominican Republic. ARREDONDO was traveling with his wife, his two minor sons, and his minor step-daughter.

2. During a baggage examination, each minor son presented a backpack for inspection. Customs and Border Protection ("CBP") Officers noticed that both backpacks appeared to have altered interior panels. CBP agents probed both backpacks, and both probes revealed a white powdery substance, which field tested positive for cocaine.

3. CBP officers then conducted a pat down search of ARREDONDO. The pat down search revealed the presence of 44 pellets concealed on ARREDONDO's person, one of which field tested positive for cocaine. ARREDONDO was placed under arrest. A pat down search of ARREDONDO's wife was negative.

4. CBP officers sought and received approval for a pat down search of ARREDONDO's two sons and step-daughter. The pat down of ARREDONDO's step-daughter was negative. The pat down search of ARREDONDO's two sons revealed that each boy was carrying 30 narcotics pellets, 22 of which field tested positive for cocaine, and 8 of which field tested positive for heroin.


5. During questioning, ARREDONDO admitted that he had ingested pellets of heroin and cocaine. ARREDONDO and his wife

were presented with an x-ray consent forms, which they read, appeared to understand, and voluntarily signed. An x-ray of ARREDONDO's wife was negative. An x-ray of ARREDONDO revealed the presence of foreign bodies in ARREDONDO's intestinal track.


6. Defendant ARREDONDO will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

7. The minor children were released to the custody of ARREDONDO's wife.

WHEREFORE, your deponent respectfully requests that defendant FIDEL ARREDONDO be dealt with according to law.

  
CHRIS MCKELVY  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
31st day of July, 2012

  
HONORABLE  
UNITED STA  
EASTERN DI.

S/Azrack